

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

EASTERN DIVISION

PLATINUMTEL COMMUNICATIONS,)	
LLC,)	
)	
Plaintiff,)	
)	No. 08 CV 1062
vs.)	
)	Judge JOAN H. LEFKOW
ZEFCOM, LLC d/b/a TELISPIRE,)	
TELISPIRE, INC, et al,)	
)	
Defendants.)	
)	

**DEFENDANT TELISPIRE'S MOTION
TO DISMISS ALL CLAIMS AGAINST TELISPIRE FOR FAILURE
TO STATE A CLAIM AND FAILURE TO PLEAD FRAUD WITH SPECIFICITY**

Defendant ZefCom, LLC d/b/a Telispire® ("Telispire"), by its attorneys, respectfully moves this Court pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6) to enter an order dismissing with prejudice each of the claims asserted against Telispire by plaintiff PlatinumTel Communications, LLC ("PlatinumTel") in Counts I through V of PlatinumTel's Complaint. PlatinumTel's claims against Telispire should be dismissed because PlatinumTel has failed to allege sufficient facts to support Counts I-V. In addition, each Count is based upon alleged fraud, and PlatinumTel has failed to plead any of the Counts with the specificity required under Rule 9(b). In support of this motion, Telispire submits its Memorandum of Law in Support of Its Motion to Dismiss Plaintiff's Complaint.

Dated: March 27, 2008

Respectfully submitted,

ZEFCOM, LLC d/b/a TELISPIRE, INC.

By: s/ Terri L. Mascherin
One of its Attorneys

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